

ADL Environmental
4575 E. Corral Road
Phoenix, AZ 85044
(602) 228-1090

August 25th, 2022

Balaji Vaidyanathan
Arizona Department of Environmental Quality
Air Quality Department Permits Section
1110 W. Washington Street
Phoenix, AZ 85007

Re: Individual Permit Application Renewal for McNeil Brothers Inc. Portable Soil Cement Plant under existing permit #67297

Dear Mr. Vaidyanathan:

I have included with this letter a permit renewal application for an individual permit for McNeil Brothers WEMCO Portable Concrete Batch Plant. The plant is currently permitted and operating under concrete plant individual permit #67297 and expires on December 28th, 2022. The plant is currently disassembled and being stored in the Salt River Materials Group pit in the NWC of the loop 101 and loop 202 freeways in Phoenix. As the plant is not operating in this location, for modeling purposes, the plant was modeled in the location that their Erie 2 Plant (permit 89308) is currently operating which is just east of 24th Street on the south side of the I-10 Freeway in Phoenix. We felt this was a very conservative location to perform modeling as its located in an area of Phoenix with high PM background concentrations.

I have partnered with Leonard Montenegro with NumAIRic, LLC to do the AERMOD dispersion modeling for the plant. The modeling has been completed and was reviewed by Feng. The modeling report and modeling files have been submitted to Feng at ADEQ.

Included with this application are detailed emissions calculations and detailed plant information.

Please accept this application for consideration of renewal of the individual permit for the cement plant. If you have any questions, please do not hesitate to contact me at (602) 228-1090.

Thank you,

AARON LAROQUE ^{ADL}

Aaron D. LaRoque, P.E.

C:

Greg McNeil, President
McNeil Brothers, Inc.

SECTION 3.1
ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
Air Quality Division
1110 West Washington • Phoenix, AZ 85007 • Phone: (602) 771-2338

STANDARD CLASS II PERMIT APPLICATION FORM

(As required by A.R.S. § 49-426, and Chapter 2, Article 3, Arizona Administrative Code)

1. Permit to be issued to (Business license name of organization that is to receive permit):
McNeil Brothers, Inc.
2. Mailing Address: 8660 E Hartford Dr
City: Scottsdale State: AZ ZIP: 85255
3. Name (or names) of Responsible Official: Greg McNeil
Phone: 480-940-4232 Fax: 480-940-4233 Email: greg@mcneilbrothers.com
4. Facility Manager/Contact Person and Title: Greg McNeil
Phone: Same Fax: Same Email: Same
5. Facility Name: WEMCO Portable Concrete Batch Plant
Facility Location/Address (Current/Proposed): In-storage at Loop 101 & Loop 202
City: Phoenix County: Maricopa ZIP: _____
Indian Reservation (if applicable, which one): Salt River
Latitude/Longitude, Elevation: 33° 26 min 47.1 sec N / 111° 52 min 27.1 sec W
6. General Nature of Business: Concrete production
7. Type of Organization:
☒ Corporation ☐ Individual Owner ☐ Partnership ☐ Government Entity ☐ LLC
☐ Other _____
8. Permit Application Basis: ☐ New Source ☐ Revision ☒ Renewal of Existing Permit
For renewal or modification, include existing permit number (and exp. date): ~~67297~~ 67297
Date of Commencement of Construction or Modification: N/A
Primary Standard Industrial Classification Code: 3273
9. I certify that I have knowledge of the facts herein set forth, that the same are true, accurate and complete to the best of my knowledge and belief, and that all information not identified by me as confidential in nature shall be treated by ADEQ as public record. I also attest that I am in compliance with the applicable requirements of the Permit and will continue to comply with such requirements and any future requirements that become effective during the life of the Permit. I will present a certification of compliance to ADEQ no less than annually and more frequently if specified by ADEQ. I further state that

I will assume responsibility for the construction, modification, or operation of the source in accordance with Arizona Administrative Code, Title 18, Chapter 2 and any permit issued thereof.

Signature of Responsible Official: _____

Printed Name of Signer/Official Title: _____

Date: _____

Telephone Number: _____

Greg McNeil President

8/27/22

480-940-4232

Section 3.5 - Equipment List

[illegible]

[1] For generator sets, enter the maximum rated capacity of the engine rather than the maximum rated capacity of the generator.

All relevant equipment utilized at the facility should be included in the equipment list. Please complete all fields.

The date of manufacture must be included in order to determine applicability of regulations.

Indicate the units (tons/hour, horsepower, etc.) when recording the maximum rated capacity.

Make additional copies of this form if necessary.

***Submit photographs of the faceplates for all engines listed above.**

***If an engine is certified, please also include a copy of the engine certification with the application.**

***For any newly added equipment, include a copy of the specification sheet.**

***These documents will be used to verify equipment information and determine applicable regulations.**

SECTION 3.6 - EMISSION SOURCE FORM

Emission Point		Regulated Air Pollutant Name	PTE		PTE AFTER MODIFICATION		CHANGE IN PTE
			lbs/hr	tons/yr	lbs/hr	tons/yr	
ES	Sand / Aggregate Elevated Storage	PM	.364	1.6			
		PM-10	.172	.75			
		PM-2.5	.026	.11			
SL	Cement Silo	PM	.033	.15			
		PM-10	.011	.05			
		PM-2.5	.002	.01			
SL	Fly Ash Silo	PM	.087	.38			
		PM-10	.048	.21			
		PM-2.5	.007	.03			
WH	Weigh Hopper	PM	.192	.84			
		PM-10	.091	.40			
		PM-2.5	.014	.06			
CML	Central Mix Loading	PM	.072	.31			
		PM-10	.051	.22			
		PM-2.5	.01	.05			

****Submit emission calculations spreadsheet with your application****

SECTION 3.6 - EMISSION SOURCE FORM

Emission Point		Regulated Air Pollutant Name	PTE		USE THIS SECTION FOR MODIFICATIONS ONLY	
Number	Name		lbs/hr	tons/yr	PTE AFTER MODIFICATION	CHANGE IN PTE
			lbs/hr	tons/yr	lbs/hr	tons/yr
SAU	Sand & Aggregate Unloading	PM	.364	1.60		
		PM-10	.172	.75		
		PM-2.5	.026	.11		
CB	Sand & Aggregate Conveyor to Piles	PM	.364	1.60		
		PM-10	.172	.75		
		PM-2.5	.026	.11		
AAH57	Aggregate # 57	PM	.364	1.60		
AAH4	Aggregate # 4	PM-10	.172	.75		
SH	Sand Hopper	PM-2.5	.026	.11		
HR	Haul Roads Combined	PM	2.19	9.57		
		PM-10	.57	2.51		
		PM-2.5	.38	1.67		
SP1	Aggregate Piles	PM	.0279	.1222		
SP2	Sand Piles	PM-10	.0140	.0611		
		PM-2.5	.0021	.0092		

****Submit emission calculations spreadsheet with your application****

SECTION 5.0 -APPLICATION ADMINISTRATIVE COMPLETENESS CHECKLIST

	REQUIREMENT	MEETS REQUIREMENTS			COMMENT
		YES	NO	N/A	
1	Has the standard application form been completed?	X			
2	Has the responsible official signed the standard application form?	X			
3	Has a process description been provided?	X			
4	Are the facility's emissions documented with all appropriate supporting information?	X			
5	Is the facility subject to Minor NSR requirements? If the answer is "YES", answer 6a, 6b and 6c as applicable. If the answer is "NO", skip to 7.	X			
6.a	If the facility chooses to implement RACT, is the RACT determination included for the affected pollutants for all affected emission units?	X			Emission Controls for each source attached
6.b	If the facility chooses to demonstrate compliance with NAAQS by screen modeling, is the modeling analysis included?			X	
6.c	If refined modeling has been conducted, is a comprehensive modeling report along with all modeling files included?	X			Sent to Feng
7	Does the application include an equipment list with the type, name, make, model, serial number, maximum rated capacity, and date of manufacture?	X			
8	Does the application include an identification and description of Pollution Controls? (if applicable)	X			
9	For any application component claimed as confidential, are the requirements of AR.S. 49-432 and A.A.C. R18-2-305 addressed?			X	
10	For any current non-compliance issue, is a compliance schedule attached?			X	
11	For minor permit revision that will make a modification upon submittal of application, has a suggested draft permit been attached?			X	